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August 18, 2004

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Mr. Henri Bisson  
State Director  
Bureau of Land Management  
222 W. 7<sup>th</sup> Avenue  
Anchorage, AK 99513

Dear Mr. Bisson:

1 Ducks Unlimited is the largest waterfowl and wetland conservation organization in North America, with approximately 700,000 members. As such we are vitally interested in your agency's proposal to amend the 1998 Integrated Activity Plan/Environmental Impact Statement for the 4.6 million-acre Northeast Planning Area of the National Petroleum Reserve-Alaska (NPR-A).

2 For reasons related to the potentially significant negative impacts on critical waterfowl habitats as discussed in more detail below, Ducks Unlimited supports Alternative A as described within the draft Environmental Impact Statement (EIS). Ducks Unlimited opposes Alternative B (your agency's Preferred Alternative) and Alternative C.

Presented with only the three alternatives evaluated in the draft EIS, we must support the No Action Alternative, Alternative A. However, Ducks Unlimited is not in opposition to additional oil and gas leasing in NPR-A, and we believe that a great disservice was done in structuring the draft EIS around only these three alternatives. The lack of an alternative that would have expanded leasing in much of NPR-A while maintaining protection of the globally significant waterfowl and other wildlife habitats is a critical flaw in the draft EIS. The lack of such an alternative unreasonably and unnecessarily constrains discussion, precluding development and consideration of a responsible, centrist approach to the development of energy resources in this region.

4 We thank you for having your staff meet with Dr. Fritz Reid and Tom Dwyer in our Vancouver Field Office on July 28, 2004 to discuss the proposed NE-NPR-4 Plan amendments. This letter provides follow-up comments to that meeting.

5 As you are aware, Ducks Unlimited worked with your agency, the North Slope Borough, and the U.S. Fish and Wildlife Service to map land cover types across the entire NPR-A during the mid-90s. Our staff has extensive field knowledge of the Northeast Planning Area and has published information on waterfowl and habitat relationships in the planning area (Morton et al. 1997). We have a strong interest in

5 the waterfowl habitats of NPR-A that support abundant and critical migratory bird resources, especially those on the coastal plain, including Teshekpuk Lake Special Area (TLSA) and the Ikpikpuk Delta.

6 The Teshekpuk Lake Special Area constitutes a traditional molting site for 50,000-90,000 geese, where Pacific black brant make up an important component. There are several reasons that this area is extremely important to waterfowl, other wildlife, and the public:

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Special  
Designation

- It contains unique lacustrine wetland and tundra habitats that are free of human disturbance.

008  
Birds

- It is a critical staging and molting habitat for a significant portion of the world's population of Pacific black brant. These birds breed in western Alaska, Canada, and Russia and are protected under international treaties. We remain particularly concerned about declining brant populations, to the point where restrictive hunting thresholds could be reached. Western Arctic brant have a very small population and disturbance or perturbation could put this population at increased risk.

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Birds

- Northern pintail regularly use this area when southern prairies face drought. Large concentrations of pintails use TLSA and the coastal plain during such conditions. Pintail populations are well below management objectives and areas important to this species must be protected.
- Up to 35,000 white-fronted geese molt and stage in the TLSA.
- Tundra swans, spectacled eider, greater scaup, and American wigeon use these lacustrine wetlands.

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Special  
Designation

We note that there has been a steady erosion of boundaries of the TLSA, reducing the amount of waterfowl habitat and molting lakes that are given special recognition. We recognize the conservation efforts of the U.S. gas and oil industries in Alaska, including reduced summer activity and helicopter fly-overs of molting areas. However, expanded leasing in the TLSA would degrade critical waterfowl habitat potentially causing detrimental population effects to several sensitive species, more than negatively offsetting the past conservation efforts of the industry.

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Birds

Ducks Unlimited strongly urges your agency to examine and consider recent analyses of U.S. Fish and Wildlife Service waterfowl survey data completed by the U.S. Geological Survey. Their analyses indicate that the "core" area for molting geese may be shifting. Their data shows that since 1999, an average of 45% of molting brant in the TLSA use lakes that would be partially or wholly available for leasing under the "preferred alternative." Given that up to 30% of the Pacific Flyway brant population uses the TLSA, additional leasing could have significant effects on a species whose populations are well below management objectives. And, on average, 38% of molting greater white-fronted geese and 50% of Canada geese use lakes that would be open to leasing.

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Birds

Published work has shown that TLSA is unique and no other known area within the Alaskan Coastal Plain could replace this habitat for brant. This past work also shows that helicopter disturbance has a measurable effect on body condition of brant during the molting period with implications for survival. The combination of low-lying topography, forage and isolation from predators and disturbance truly makes this area unique for brant.

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Birds

The draft EIS must recognize the broad interests of stakeholders from throughout the U.S., arctic and boreal Canada, Russia, Mexico, and First Nations of Canada in the migratory bird resources of this region. For example, a large proportion of black brant that breed on the Yukon-Kuskokwim Delta congregate in the TLSA to molt. Thus, long-term effects on subsistence communities are not limited to the North Slope Borough. The critical goose

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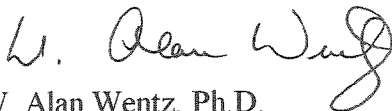
molting and staging area in the TLSA should not be offered for leasing. Seasonal human activity should be restricted to preserve the security of molting geese from disturbance and stress. These elements should provide the foundation for the development of an acceptable alternative that expands leasing, yet provides needed protection to the relatively limited, globally significant waterfowl and migratory bird habitats within the region. Unfortunately, that centrist alternative resides somewhere in the large gap between Alternative A, the No Action Alternative, and Alternative B, the agency's Preferred Alternative.

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Finally, Ducks Unlimited supports the Pacific Flyway Council's proposal that, because of the importance of the Teshekpuk Lake Special Area to continental waterfowl populations, it should be given permanent protection from future development by Secretarial designation.

We appreciate the opportunity to provide comments and recommendations on your proposal for expansion of leasing area in the TLSA.

Sincerely,



W. Alan Wentz, Ph.D.  
Group Manager Conservation

cc: Rudy Rosen  
Bob Hoffman

Thomas Dwyer  
Jeff Nelson

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